IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

NEW BALANCE ATHLETICS, INC.,)
Plaintiff,)) C. A. No. 17-cv-01700-VAC-SRF
V.) Harrand La Charra D. Fallan
USA NEW BUNREN INTERNATIONAL) Honorable Sherry R. Fallon
CO. LIMITED LLC,)
Defendant.)

UNOPPOSED MOTION TO EXTEND TIME TO ANSWER COMPLAINT

Plaintiff New Balance Athletics, Inc. ("New Balance"), by and through its attorneys, respectfully moves this Court for an extension of time in which Defendants are required to respond to the Complaint in this matter, and in support of this motion, states as follows:

- 1. The Complaint in this matter was personally served on Defendant's registered agent on November 27, 2017 (D.I. 5). Defendant is required to respond to the Complaint on or before December 18, 2017.
- 2. The parties have preliminarily discussed engaging in settlement discussions, and in light of such discussions, Defendant has requested additional time to respond to the Complaint.
- 3. New Balance has consented to Defendant's request for additional time, and hereby requests that the deadline for Defendant to respond to the Complaint be extended for 30 days, up to and including January 17, 2018.
 - 4. This is the parties' first request for an extension of time.

WHEREFORE, New Balance respectfully moves this Court for an extension of time in

which Defendants are required to respond to the Complaint, resetting that deadline to January 17, 2018.

Dated: December 14, 2017 CONNOLLY GALLAGHER LLP

Of Counsel:

Thomas L. Holt (PHV Pending)
Jeremy L. Buxbaum (PHV Pending)
Caroline A. Teichner (PHV Pending)

PERKINS COIE LLP 131 South Dearborn Street

Suite 1700

Chicago, Illinois 60603 T: (312) 324.8400 F: (312) 324.9400 THolt@perkinscoie.com

JBuxbaum@perkinscoie.com CTeichner@perkinscoie.com /s/ Arthur G. Connolly, III

Arthur G. Connolly, III (#2667) Ryan P. Newell (#4744)

Mary I. Akhimien (#5448) The Brandywine Building

1000 West Street

Wilmington, DE 19801

(302) 757-7300

aconnolly@connollygallagher.com rnewell@connollygallagher.com makhimien@connollygallagher.com

Attorneys for Plaintiff New Balance Athletics, Inc.

IT IS SO ORDERED this _____ day of December, 2017.

U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2017, copies of the foregoing were caused to be served upon the following via electronic mail:

Justin King WPAT, P.C. 8230 Boone Blvd. Suite 405 Vienna, VA 22182 jking@wpat.com

/s/ Arthur G. Connolly, III
Arthur G. Connolly (#2667)